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**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In Re:  
  
ANDREW BUNKER PLATT and RUTH ANN  
PLATT  
  
Debtor(s).

Case No. BK-S-19-17282-btb  
  
Adversary Proceeding:  
  
Chapter 7

WOODS & ERICKSON, LLP, a Nevada Limited  
Liability Partnership, d/b/a WOODS ERICKSON  
& WHITAKER, LLP,

Plaintiff,

vs.

ANDREW B. PLATT, an individual; L&S  
COUNSELORS LTD., a Nevada Limited-  
Liability Company; GATEHOUSE  
STRATEGIES, LLC, a Nevada Limited Liability  
Company; JOHN DOE DEFENDANTS I  
THROUGH X; and ROE ENTITIES I  
THROUGH X,

Defendants.

ANDREW B. PLATT, an individual; and L&S  
COUNSELORS LTD., a Nevada Limited-  
Liability Company,

Counter-Claimants,

vs.

WOODS & ERICKSON, LLP, a Nevada  
limited liability partnership, d/b/a WOODS  
ERICKSON & WHITAKER, LLP,

Counter-Defendant.

**NOTICE OF REMOVAL**

**NOTICE OF REMOVAL**

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiff/Counter-Defendant, Woods & Erickson, LLP d/b/a Woods Erickson & Whitaker, LLP ("WEW") hereby removes Case No. A-18-774926-C, pending in the Eighth Judicial District Court, State of Nevada, (the "State Court Action") to the United States Bankruptcy Court, District of Nevada, pursuant to 28 U.S.C. §§ 1334 and 1452, and Local Rule 9027.

The State Court Action arises from Debtor Andrew Platt's ("Platt") activities while an employee/limited partner of the Firm and includes claims against Platt for, amongst other things, fraudulent misrepresentation and concealment and breach of fiduciary duty. Platt is an attorney that worked at the Firm from August, 2007 until April 20, 2018, or for nearly eleven (11) years. Platt was hired first as an associate and was later made a limited partner of the Firm on January 1, 2016. During his tenure with the Firm, Platt secretly and without authorization from the Firm began to collect fees outside of the Firm from individuals or entities to whom Platt provided legal services. Initially, Platt wrongfully collected fees individually for services he provided to the Renaissance Academy. Later, Platt formed his own law firm, L&S Counselors, Ltd., through which Platt directly and covertly competed with the Firm, and to which Platt diverted clients and fees which rightfully belonged to the Firm. During this time, Platt used the Firm's computers, internet, phones, equipment, staff, legal forms and office space to provide legal services to clients of his new firm, all the while receiving compensation from the Firm.

Upon removal, the Firm consents to entry of final orders and judgments by the Bankruptcy Court.

True and correct copies of all process and pleadings filed in the State Court Action are attached hereto as Exhibits 1-129.

**EXHIBIT LIST**

<b>Exhibit 1</b>	Complaint
<b>Exhibit 2</b>	Initial Appearance Fee Disclosure
<b>Exhibit 3</b>	Summons (Gatehouse Strategies, LLC)

1	<b>Exhibit 4</b>	Summons (Andrew B. Platt)
2	<b>Exhibit 5</b>	Summons (L&S Counselors)
3	<b>Exhibit 6</b>	Proof of Service (Andrew B. Platt, an Individual)
4	<b>Exhibit 7</b>	Proof of Service (L&S Counselors Ltd.)
5	<b>Exhibit 8</b>	Affidavit of Process Server Re: Gatehouse Strategies, LLC, a Nevada Limited Liability Company
6	<b>Exhibit 9</b>	Peremptory Challenge of Judge
7	<b>Exhibit 10</b>	Initial Appearance Fee Disclosure
8	<b>Exhibit 11</b>	Answer and Counterclaim
9	<b>Exhibit 12</b>	Defendant Gatehouse Strategies LLLP's Answer to Complaint
10	<b>Exhibit 13</b>	Initial Appearance Fee Disclosure
11	<b>Exhibit 14</b>	Notice of Department Reassignment
12	<b>Exhibit 15</b>	Reply to Counterclaim
13	<b>Exhibit 16</b>	Plaintiff's Petition for Exemption from Arbitration
14	<b>Exhibit 17</b>	Commissioner's Decision on Request for Exemption - GRANTED
15	<b>Exhibit 18</b>	Demand for Jury Trial
16	<b>Exhibit 19</b>	Joint Case Conference Report
17	<b>Exhibit 20</b>	Stipulated Protective Order
18	<b>Exhibit 21</b>	Notice of Entry of Stipulated Protective Order
19	<b>Exhibit 22</b>	Joint Case Conference Report
20	<b>Exhibit 23</b>	Scheduling Order
21	<b>Exhibit 24</b>	Order Setting Civil Jury Trial
22	<b>Exhibit 25</b>	Stipulation and Order to Extend Discovery and Continue Trial (First Request)
23	<b>Exhibit 26</b>	Notice of Entry of Stipulation and Order to Extend Discovery and Continue Trial (First Request)
24	<b>Exhibit 27</b>	First Amended Order Setting Civil Jury Trial
25	<b>Exhibit 28</b>	Motion to Withdraw Admissions Pursuant to NRCP 36(b)
26	<b>Exhibit 29</b>	Opposition to Motion to Withdraw Admissions
27	<b>Exhibit 30</b>	Stipulation and Order to Extend Discovery Deadlines Without Affecting Trial Date (Second Request)
28	<b>Exhibit 31</b>	Notice of Entry of Stipulation and Order to Extend Discovery Deadlines Without Affecting Trial Date (Second Request)
	<b>Exhibit 32</b>	Motion to Strike/Withdraw Pleading from the Record

1	<b>Exhibit 33</b>	Notice of Hearing
2	<b>Exhibit 34</b>	Reply in Support of Motion to Withdraw Admissions Pursuant to NRCP 36(b)
3	<b>Exhibit 35</b>	Minute Order Re: Plaintiff's Motion to Withdraw Admissions
4	<b>Exhibit 36</b>	Motion for Leave to Amend Answer and Counterclaim
5	<b>Exhibit 37</b>	Stipulation and Order to Extend Expert Disclosures Deadlines and Allow for Deposition of Rebuttal Experts After the Close of Discovery
6	<b>Exhibit 38</b>	Stipulation and Order to Extend Expert Disclosure Deadlines and Allow for Deposition of Rebuttal Experts After the Close of Discovery
7	<b>Exhibit 39</b>	Order on Motion to Withdraw Admissions Pursuant to NRCP 36(b)
8	<b>Exhibit 40</b>	Notice of Entry of Stipulation and Order to Extend Expert Disclosure Deadlines and Allow for Deposition of Rebuttal Experts After the Close of Discovery (Third Request)
9		
10	<b>Exhibit 41</b>	Notice of Entry of Order on Motion to Withdraw Admissions Pursuant to NRCP 36(b)
11	<b>Exhibit 42</b>	Notice of Hearing
12	<b>Exhibit 43</b>	Minute Order Re: Defendants' Motion to Strike
13	<b>Exhibit 44</b>	Motion to Compel Discovery
14	<b>Exhibit 45</b>	Notice of Hearing
15	<b>Exhibit 46</b>	Minute Order Re: Motion to Compel Discovery
16	<b>Exhibit 47</b>	Notice of Hearing Regarding Motion to Compel Discovery
17	<b>Exhibit 48</b>	Notice of Hearing
18	<b>Exhibit 49</b>	Minute Order Re: Defendants' Motion to Amend Answer and Counterclaim
19	<b>Exhibit 50</b>	Notice of Entry of Order Granting Motion to Strike/Withdraw Pleading from the Record
20	<b>Exhibit 51</b>	Opposition to Motion to Compel Discovery
21	<b>Exhibit 52</b>	Stipulation and Order to Amend Complaint and Caption to Correct the Name of Gatehouse Strategies, LLLP
22	<b>Exhibit 53</b>	Notice of Entry of Stipulation and Order to Amend Complaint and Caption to Correct the Name of Gatehouse Strategies, LLLP
23	<b>Exhibit 54</b>	Order Granting Motion for Leave to Amend Answer and Counterclaim
24	<b>Exhibit 55</b>	First Amended Complaint
25	<b>Exhibit 56</b>	Notice of Entry of Order Granting Motion for Leave to Amend Answer and Counterclaim
26	<b>Exhibit 57</b>	Order Granting Motion to Strike/Withdraw Pleading from the Record
27	<b>Exhibit 58</b>	Amended Answer and Counterclaim
28	<b>Exhibit 59</b>	Proof of Service of Subpoena Duces Tecum Upon Dennis Kennedy

1	<b>Exhibit 60</b>	Motion to Extend Discovery and Trial (Fourth Request)
2	<b>Exhibit 61</b>	Reply in Support of Motion to Compel Discovery
3	<b>Exhibit 62</b>	Notice of Hearing
4	<b>Exhibit 63</b>	Application for Order Shortening Time re Defendants' Motion to Extend Discovery and Trial
5	<b>Exhibit 64</b>	Notice of Entry of Order
6	<b>Exhibit 65</b>	Receipt of Copy of Order Shortening Time
7	<b>Exhibit 66</b>	Opposition to Motion to Extend Discovery and Trial
8	<b>Exhibit 67</b>	Reply to Plaintiffs Opposition to Motion to Extend Discovery and Trial
9	<b>Exhibit 68</b>	Answer to Counterclaim
10	<b>Exhibit 69</b>	Order Setting Settlement Conference
11	<b>Exhibit 70</b>	Order Re: Defendants' Motion to Extend Discovery and Trial
12	<b>Exhibit 71</b>	Notice of Entry of Order Re: Defendants' Motion to Extend Discovery Trial
13	<b>Exhibit 72</b>	Notice to Appear for Discovery Conference
14	<b>Exhibit 73</b>	Motion for Summary Judgment
15	<b>Exhibit 74</b>	Appendix of Exhibits to Motion for Summary Judgment - <b>FILED UNDER SEAL</b>
16	<b>Exhibit 75</b>	Certificate of Service
17	<b>Exhibit 76</b>	Notice of Hearing
18	<b>Exhibit 77</b>	Redacted version of Appendix removing and sealing Exhibits 1-25 per Order 8/26/19
19	<b>Exhibit 78</b>	Discovery Commissioner's Report and Recommendations
20	<b>Exhibit 79</b>	Notice of Change of Address and Contact Numbers
21	<b>Exhibit 80</b>	Motion for Summary Judgment Pursuant to NRCP 56
22	<b>Exhibit 81</b>	Notice of Hearing
23	<b>Exhibit 82</b>	Opposition to Motion for Summary Judgment and Countermotion for Partial Summary Judgment
24	<b>Exhibit 83</b>	Motion to Seal Exhibits to Opposition to Motion for Summary Judgment, and Countermotion for Partial Summary Judgment
25	<b>Exhibit 84</b>	Notice of Hearing
26	<b>Exhibit 85</b>	Exhibits to Opposition to motion for Summary Judgment, and Countermotion for Partial Summary Judgment - <b>FILED UNDER SEAL</b>
27	<b>Exhibit 86</b>	Order Affirming Discovery Commissioner's Report and Recommendation
28	<b>Exhibit 87</b>	Notice of Entry of Order
	<b>Exhibit 88</b>	Ex-Parte Application and Order to Seal Exhibits

1	<b>Exhibit 89</b>	Stipulation and Order to Dismiss Gatehouse Strategies, LLP
2	<b>Exhibit 90</b>	Notice of Entry of Ex-Parte Application and Order to Seal Exhibits
3	<b>Exhibit 91</b>	Notice of Entry of Stipulation and Order to Dismiss Gatehouse Strategies, LLP
4	<b>Exhibit 92</b>	Reply in Support of Motion for Summary Judgment
5	<b>Exhibit 93</b>	Continued Appendix of Exhibits to Motion for Summary Judgment and Supporting Reply
6	<b>Exhibit 94</b>	Opposition to Defendants Countermotion for Partial Summary Judgment
7	<b>Exhibit 95</b>	Stipulation and Order to Amend Answer & Counterclaim
8	<b>Exhibit 96</b>	Notice of Entry of Stipulation and Order
9	<b>Exhibit 97</b>	Second Amended Answer and Counterclaim
10	<b>Exhibit 98</b>	Minute Order Re: Defendant Gatehouse Strategies LLP's Motion for Summary Judgment Pursuant to NRCP 56
11	<b>Exhibit 99</b>	Reply in Support of Countermotion for Partial Summary Judgment
12	<b>Exhibit 100</b>	Order Granting Motion to Seal Exhibits
13	<b>Exhibit 101</b>	Notice of Entry of Order
14	<b>Exhibit 102</b>	Transcript of Hearing: Plaintiff's Motion for Summary Judgment Opposition to Motion for Summary Judgment and Countermotion for Partial Summary Judgment, September 11, 2019
15	<b>Exhibit 103</b>	Motion in Limine to Preclude Expert Witness Testimony of Dennis Kennedy
16	<b>Exhibit 104</b>	Motion in Limine to Exclude Succession Documents
17	<b>Exhibit 105</b>	Notice of Hearing
18	<b>Exhibit 106</b>	Notice of Hearing
19	<b>Exhibit 107</b>	Omnibus Motion In Limine
20	<b>Exhibit 108</b>	Appendix of Exhibits to Omnibus Motion in Limine
21	<b>Exhibit 109</b>	Motion to Seal Exhibits to Omnibus Motion in Limine
22	<b>Exhibit 110</b>	Notice of Hearing
23	<b>Exhibit 111</b>	Notice of Change of Hearing
24	<b>Exhibit 112</b>	Opposition to Motion in Limine to Exclude Succession Documents
25	<b>Exhibit 113</b>	Appendix of Exhibits to Opposition to Motion in Limine to Exclude Succession Documents
26	<b>Exhibit 114</b>	Motion to Seal Exhibits to Opposition to Motion in Limine to Exclude Succession Documents
27	<b>Exhibit 115</b>	Opposition to Motion in Limine to Preclude Expert Witness Testimony of Dennis Kennedy

<b>Exhibit 116</b>	Appendix of Exhibits to Opposition to Motion in Limine to Preclude Expert Witness Testimony of Dennis Kennedy
<b>Exhibit 117</b>	Motion to Seal Exhibits to Opposition to Motion in Limine to Preclude Expert Witness Testimony of Dennis Kennedy
<b>Exhibit 118</b>	Defendants' Opposition to Plaintiff's Omnibus Motion in Limine
<b>Exhibit 119</b>	Motion to Seal Exhibits to Defendants' Opposition to Plaintiff's Omnibus Motion in Limine
<b>Exhibit 120</b>	Notice of Hearing
<b>Exhibit 121</b>	Defendants' Opposition to Plaintiff's Omnibus Motion in Limine - <b>FILED UNDER SEAL</b>
<b>Exhibit 122</b>	Defendant/Counterclaimants' Objections to Plaintiff/Counterdefendant's NRCP Rule 16.1(a)(3) Pretrial Disclosures
<b>Exhibit 123</b>	Objection to Plaintiff/Counterdefendant's NRCP 16.1(a)(3) Pretrial Disclosures
<b>Exhibit 124</b>	Reply in Support of Motion in Limine to Exclude Succession Documents
<b>Exhibit 125</b>	Reply in Support of Motion in Limine to Preclude Expert Witness Testimony of Dennis Kennedy
<b>Exhibit 126</b>	Minute Order Re: Motion to Seal/Redact Records
<b>Exhibit 127</b>	Notice of Bankruptcy
<b>Exhibit 128</b>	Order Denying Plaintiff's Motion for Summary Judgment and Defendant's Countermotion for Partial Summary Judgment
<b>Exhibit 129</b>	Substitution of Attorney

Dated this 13<sup>th</sup> day of December, 2019.

**GERRARD COX LARSEN**

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